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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

In re:
MANUEL FERREIRA & MARIA FERREIRA
Debtors.

Case No: 10-23633-A-7
DCN: CJY-1

Chapter 7

Date: March 29, 2010
Time: 9:00 am
Place: 501 I Street, 7th Floor, Courtroom 28
Sacramento, CA

**MOTION TO COMPEL CHAPTER 7 TRUSTEE
TO ABANDON PROPERTY OF THE ESTATE**

**TO THE HONORABLE MICHAEL S. MCMANUS, GARY FARRAR/CHAPTER 7
TRUSTEE, AND ALL OTHER INTERESTED PARTIES:**

The Debtors, Manuel and Maria Ferreira (“Debtors”) hereby move this Court for an Order Granting Debtors’ MOTION TO COMPEL CHAPTER 7 TRUSTEE TO ABANDON PROPERTY OF THE ESTATE based upon the following grounds:

1. Debtors originally filed the above-referenced Chapter 7 case on February 16, 2010 bearing the case number 10-23633-A-7.
2. Debtors own and operate a small concrete businesses named “MCF Concrete” and a small irrigation pipe repair company named “Ferriera Pipe Doctor.” A true and correct copy of Schedule B of the Debtors’ Voluntary Petition is filed concurrently herewith as Exhibit “A” and incorporated herein by reference. These businesses have no marketable value outside the Debtors’ own efforts. Both businesses use the same equipment, tools and bank accounts to

1 operate the businesses. The equipment, tools and bank accounts used by these businesses are
2 listed and exempted on Schedules B and C of debtors' petition. These businesses are the
3 Debtors' main occupations at the present time. The Debtors have invested substantial
4 resources, time, and energy into these businesses and, because of the investment, wish to keep
5 operating at the present time. If the Debtors cease operations, even for a short time, they will
6 surely lose clientele, making it impossible to reopen and maintain the required expenses.

- 7 3. The businesses listed herein and operated by the Debtors, including the equipment, tools and
8 bank accounts have a liquidation value of approximately \$12,875.00, which is fully exempt
9 under various sections of the California Code of Civil Procedure. A true and correct copy of
10 Schedule C of the Debtors' Voluntary Petition is filed concurrently herewith as Exhibit "B"
11 and incorporated herein by reference.
- 12 4. The equity in Property is exempted pursuant to C.C.P. Sections 703.140(b)(5) and (6) as set
13 forth in Debtors' Amended Schedule C filed concurrently herewith in the List of Exhibits.
- 14 5. As the Property is protected and exempted, it is of inconsequential value to the bankruptcy
15 estate, and there is nothing for the Trustee to administer to unsecured creditors.

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18 DATED: February 26, 2010

/s/ Christian J. Younger
Christian J. Younger
Attorney for Debtors